REMARKS

The Examiner that claims 3, 5, 13, 15, and 20 are allowed. Applicants gratefully acknowledge the Examiner's indication of allowable subject matter.

The Examiner rejected claims 1, 2, 4, 7-12, 14, and 17-19 under 35 U.S.C. §102(e) as allegedly being anticipated by US 6,184,477 (hereafter Tanahashi).

Applicants respectfully traverse the §102 rejections with the following arguments.

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35 U.S.C. §102(e)

The Examiner rejected claims 1, 2, 4, 7-12, 14, and 17-19 under 35 U.S.C. §102(e) as allegedly being anticipated by US 6,184,477 (hereafter Tanahashi).

Applicants respectfully contend that Tanahashi does not anticipate claims 1 and 11, because Tanahashi does not teach each and every feature of claims 1 and 11. For example, Tanahashi does not teach the feature: "wherein the opening in the first metal voltage plane has an outer boundary whose shape is circular or elliptical".

Based on the preceding arguments, Applicants respectfully maintain that Tanahashi does not anticipate claims 1 and 11, and that claims 1 and 11 are in condition for allowance. Since claims 2, 4 and 7-10 depend from claim 1, Applicants contend that claims 2, 4 and 7-10 are likewise in condition for allowance. Since claims 12, 14, and 17-19 depend from claim 11, Applicants contend that claims 12, 14, and 17-19 are likewise in condition for allowance.

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CONCLUSION

Based on the preceding arguments, Applicants respectfully believe that all pending claims and the entire application meet the acceptance criteria for allowance and therefore request favorable action. If the Examiner believes that anything further would be helpful to place the application in better condition for allowance, Applicants invites the Examiner to contact Applicants' representative at the telephone number listed below. The Director is hereby authorized to charge and/or credit Deposit Account 09-0457.

Date: 11/30/2004

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